

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's	)	
Amateur Radio Service Rules to Eliminate	)	RM - 10786
Morse Code Proficiency Testing Requirements	)	
For All Classes of Amateur Licenses	)	
	)	
To: The Commission	)	

Comments Of Harold Simmons – KE4GMP

Recently I returned to the changing world of Amateur Radio currently preparing for my Morse Code exam in progressing to a General Class license. My reason for studying code is driven by two motivations: 1) because it is currently a requirement for license advancement; 2) because I have a sincere desire to learn this mode of communication.

This second reason is the motivation which will stay with me through my radio career. Learning the skill set required for Code is a matter of time, hearing and dexterity of fingers. The knowledge required to learn the technical aspects of being an Amateur Radio operator is not a manual skill set it is knowledge gained from study about what Amateur Radio is, why it works and the relationship of the technical aspects of this hobby.

My personal position is that restricting license advancement based on a manual skill set does not promote the advancement or knowledge of Amateur Radio in general. Learning to send/receive code does take time, dedication and desire. Once I am proficient with this skill I will be able to take advantage of low power for a greater reach. However I will not gain knowledge to enhance my contribution to Amateur Radio.

Many appeals presented to the FCC will address the rules, regulations, legal aspects and recent decisions pointing out why the mandatory Morse Code exam is no longer necessary and possibly

creating a conflict with the FCC's current positions. Those reasons are valid arguments based on a changing world and the need for Amateur Radio to move forward with that change. My appeal is presented based on a practical reason for eliminating the code requirement for current and future radio enthusiasts.

Promoting Morse Code as a communication mode will require a desire to learn not a requirement to learn code. Many of my friends have passed the requirement of Element 1 and never touch a key again. Hopefully I will not follow their path due to desire, not requirement.

In summary, for these reasons referenced herein, the Commission should enact the following changes to its rules in the most expeditious manner possible:

- Eliminate the "Element 1" Morse test totally from the Commission's rules for all license classes.
- Since the only testing distinction between the Technician class and the (grandfathered) Technician Plus class is the "Element 1" Morse Test, modify, as a consequential and logical change, the privileges afforded to Technician class licensees to be equivalent to those currently afforded to Technician Plus licensees and "Technician with Morse credit" licensees.

Respectfully submitted,

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